

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Abingdon Division**

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|---|---|------------------------------|
| <b>UNITED STATES OF AMERICA</b>         | ) |                              |
|   | ) |                              |
|   | ) |                              |
|   | ) |                              |
| <b>v.</b>                               | ) | <b>Case No. 1:12-CR-0002</b> |
|   | ) |                              |
| <b>EDDIE WAYNE LOUTHIAN, SR. et al.</b> | ) |                              |

**MOTION FOR PRO HAC VICE ADMISSION OF MICHAEL KHOURI**

COMES NOW Defendant Eddie Wayne Louthian, Sr., by counsel, pursuant to Local Rule 6(d), and hereby request admission of Michael Khouri *pro hac vice* in this case. Michael Khouri is not qualified or licensed to practice under the laws of the Commonwealth of Virginia. Mr. Khouri is licensed to practice and in good standing with the Supreme Court of the United States (1985), the United States Court of Appeals for the Ninth Circuit (1983), the United States District Courts for the Central District of California (1983), the Southern District of California (1981), the Western District of Texas (2008), the Northern District of Texas (1992), the Eastern District of Texas (2011), and the Northern District of Illinois (2011). Mr. Khouri is also licensed to practice and in good standing with the Supreme Court of California and the Supreme Court of Texas. Mr. Khouri will appear in association with Kathleen M. McCauley and William F. Demarest III, members of the bar of this Court.

Mr. Khouri has thirty-one (31) years of experience litigating criminal matters in Federal District Courts. He has over ten (10) years as a CJA attorney. Mr. Khouri has tried eleven (11) federal jury trials in the last seven (7) years.

Defendant has contemporaneously filed a Consent Order Granting Substitution of Attorney for the Court's entry. Upon granting that motion, Mr. Khouri will take over as lead counsel and will handle all hearings and trial in this matter.

**WHEREFORE** Defendants respectfully request that this Court grant *pro hac vice* admission to Michael Khouri in this matter.

**WHEREFORE** Defendants also request that this Court grant leave for Michael Khouri to appear at hearings and trials in the absence of the above identified associated members of the bar of this Court.

Respectfully submitted,

/s/ William F. Demarest III

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(Attorney to be admitted *pro hac vice*)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1<sup>st</sup> day of March, 2012, I filed the foregoing with the clerk of the Court using the CM/ECF system, which will automatically send a notice of filing to the following counsel of record:

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